PEPPER & CORAZZINI

L. L. P.

ATTORNEYS AT LAW

1776 K STREET, NORTHWEST, SUITE 200

WASHINGTON, D. C. 20006

(202) 296-0600

GREGG P. SKALL
E.THEODORE MALLYCK

OF COUNSEL

FREDERICK W. FORD

TELECOPIER (202) 296-5572
INTERNET PEPCOR@COMMLAW.COM
WEB SITE HTTP://WWW.COMMLAW.COM

November 14, 1996

RECEIVED

NOV 1 4 1996

Mr. William F. Caton DOCKETFILE (Acting Secretary Federal Communications Commission Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Federa! Communications Commission
Office of Secretary

Re: Petition for Rule Making

Seeking to Allot Channel 278C3 to

Dickson, Oklahoma

Dear Mr. Caton:

VINCENT A PEPPER

PETER GUTMANN

NEAL J. FRIEDMAN

ELLEN S. MANDELL HOWARD J. BARR

MICHAEL J. LEHMKUHL #

SUZANNE C. SPINK #

RONALD G. LONDON *
MICHAEL H. SHACTER
* NOT ADMITTED IN D.C.

ROBERT F. CORAZZINI

On behalf of Redwood Broadcasting, Inc., please find enclosed an original and four (4) copies of a Petition for Rule Making seeking that the Commission institute a rule making proceeding looking toward the allotment of FM Channel 278C3 to Dickson, Oklahoma, as its first local transmission service. This petition is respectfully directed to the Chief of the Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

Ronald G. Londor

Enclosures

No. of Copies rec'd OLY List ABCDE

RECEIVED

Before the FEDERAL COMMUNICATIONS COMMISSION NOV 1 4 1996 Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of)
Amendment of Section 73.202(b) Table of Allotments FM Broadcast Stations (Dickson, Oklahoma)) RM

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Redwood Broadcasting, Inc., by its attorneys, pursuant to Section 1.401 of the Commission's rules, hereby seeks the institution of a rule making proceeding looking toward the allotment of FM Channel 278C3 to Dickson, Oklahoma (population 942 persons -- 1990 U.S. Census), as its first local transmission service. ¹

Attached is an engineering exhibit prepared by Michael W. Radovich, P.E. showing full spacings for the proposed allotment. It is proposed that the FM Table of Allotments be amended as follows:

Community	Present	Proposed	
Dickson, Oklahoma	<u>-</u>	278C3	

FM Channel 278C3 may be allotted to Dickson, Oklahoma, consistent with all Commission spacing rules at reference coordinates of 34° 11' 14" North Latitude, 96° 59' 03" West Longitude.

Redwood Broadcasting, Inc. has a present intention to apply for the channel, if allotted, and if authorized, to build a station promptly.

Respectfully submitted,

REDWOOD BROADCASTING, INC.

Ronald G. London

Its Attorney

Pepper & Corazzini, L.L.P. 1776 K Street, N.W. Suite 200 Washington, D.C. 20006 (202) 296-0600

November 14, 1996

RGL/sb f:\wp\5072AA\petrm.rgl CONSULTING COMMUNICATIONS ENGINEERS EMC TEST LABORATORIES

8899 Hastings St. NE, Minneapolis, MN 55449 (612) 785-4115 • Fax (612) 785-4631 1-800-797-1338

ENGINEERING STATEMENT ON BEHALF OF REDWOOD BROADCASTING, INC. IN SUPPORT OF A PETITION TO AMEND THE FM TABLE OF ALLOTMENTS DICKSON, OKLAHOMA **EMC TEST LABORATORIES**

8899 Hastings St. NE, Minneapolis, MN 55449 (612) 785-4115 • Fax (612) 785-4631 1-800-797-1338

ENGINEERING STATEMENT ON BEHALF OF REDWOOD BROADCASTING, INC. IN SUPPORT OF A PETITION TO AMEND THE FM TABLE OF ALLOTMENTS DICKSON, OKLAHOMA

Owl Engineering, Inc. has been retained by Redwood Broadcasting, Inc. (hereinafter Redwood) to prepare this engineering statement in support of a Petition to Amend the FM Table of allotments, FCC Rule Section 73.202(b) as follows:

Location

Present

Proposed

Dickson, OK

None

278C3

The reference coordinates for Dickson used in this study are:

34° 11' 14" North Latitude 96° 59' 03" West Longitude

These coordinates are based on the reference coordinates for the community of Dickson. No site restriction is required.

The community of Dickson has a population of 942 persons based on 1990 US Census data.

Included as Engineering Exhibit E-1 is a channel allocation study based on the reference coordinates listed above. As can be seen from this exhibit, Redwood's proposal is in complete conformance with FCC Rule Section 73.207.

CONSULTING COMMUNICATIONS ENGINEERS EMC TEST LABORATORIES

8899 Hastings St. NE, Minneapolis, MN 55449 (612) 785-4115 • Fax (612) 785-4631 1-800-797-1338

ENGINEERING STATEMENT ON BEHALF OF REDWOOD BROADCASTING, INC. IN SUPPORT OF A PETITION TO AMEND THE FM TABLE OF ALLOTMENTS DICKSON, OKLAHOMA

An engineering study was performed to determine the number of persons to be served by a Class C3 facility based on the reference coordinates. The 60 dBu contour was calculated for maximized Class C3 facilities and is shown in Engineering Exhibit E-2. The proposed Class C3 facilities would serve a population of 66,878 persons encompassed in an area of 4,754 km². The actual number of persons and area served will depend on the final tower location authorized.

Based on the engineering studies provided, the following conclusions can be obtained:

- 1. The proposal will provide Dickson with a first local full time broadcast service.
- 2. Based on 1990 US Census data, 66,878 persons will be served by a signal of 60 dBu or greater from the reference coordinates.
- 3. The proposal meets the requirements of FCC Rule Section 73.315.
- 4. The proposal meets the requirements of FCC Rule Section 73.207.



CONSULTING COMMUNICATIONS ENGINEERS EMC TEST LABORATORIES

8899 Hastings St. NE, Minneapolis, MN 55449 (612) 785-4115 • Fax (612) 785-4631 1-800-797-1338

ENGINEERING STATEMENT ON BEHALF OF REDWOOD BROADCASTING, INC. IN SUPPORT OF A PETITION TO AMEND THE FM TABLE OF ALLOTMENTS DICKSON, OKLAHOMA

AF	FI	D	41	٧I	T

RAMSEY COUNTY)	
)	88:
STATE OF MINNESOTA)	

Michael W. Radovich, being first duly sworn, says that he is an employee of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



Michael W. Radovich, P.E.

Subscribed and sworn to before me this date November 5, 1996

DIANE S. LYSIAK
NOTARY PUBLIC - MINNESOTA
RAMSEY COUNTY
MY COMM EXPIRES 1-31-2000

Diane S. Lysiak
Notary Public

My commission expires January 31, 2000

EMC TEST LABORATORIES

8899 Hastings St. NE, Minneapolis, MN 55449 (612) 785-4115 • Fax (612) 785-4631 1-800-797-1338

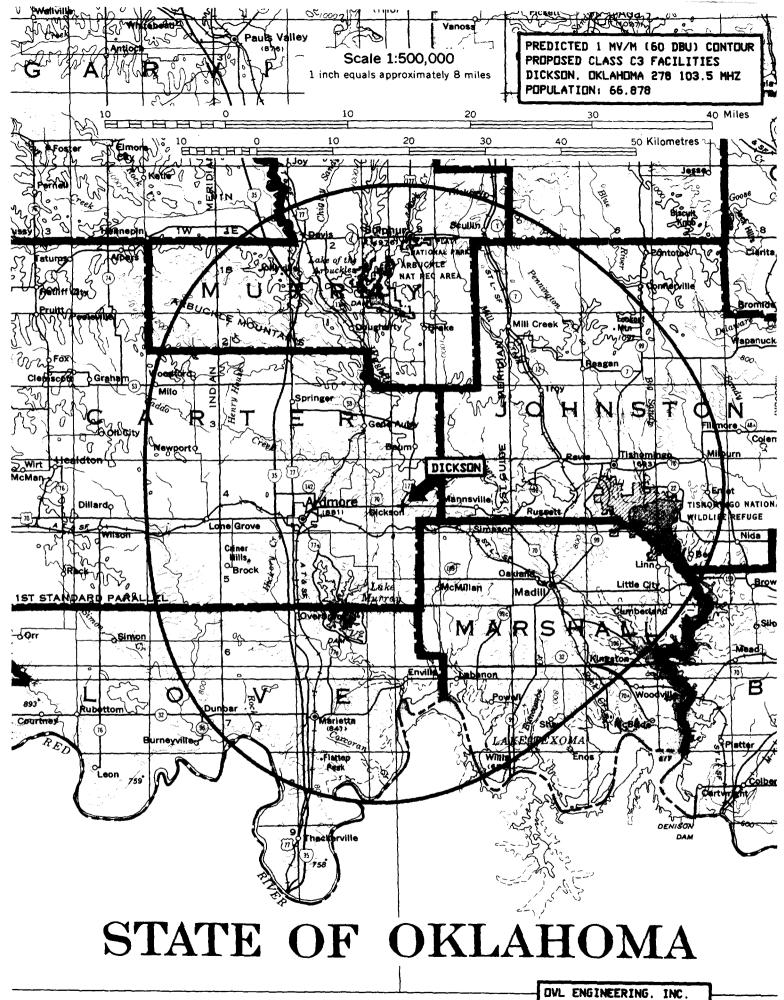
ENGINEERING EXHIBIT E-1

CHANNEL ALLOCATION STUDY

Job Title-> Dickson, OK Site Description-> Center City FM Channel 278-C3 (103.5 MHz)

LATITUDE: 34 11' 14" LONGITUDE: 96 59' 3"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing Degrees
224	NO	CONFLICT					
225	NO	CONFLICT					
275	NO	CONFLICT					
276		FAOK Atoka	C2	80.81	56	24.81	75.08
276	KHKCFM	FMOK Atoka	A	77.44	42	35.44	70.39
277		FATX Commerce	C3	141.70	99	42.70	140.86
277		FATX Wichita Falls	C1	147.47	144	3.47	257.74
277	KWFSFM	FMTX Wichita Falls	C1	147.47	144	3.47	257.74
277	KEMM	FMTX Commerce	C3	141.70	99	42.70	140.86
278	МО	CONFLICT					
279	KRPTFM	FMOK Anadarko	Cl	152.71	144	8.71	303.75
279	KVILFM	FMTX Highland Park-1		178.07	176	2.07	179.74
279	NEW	FMOK Wilburton	C1	147.28	144	3.28	52.47
279	NEW	FMOK Wilburton	C1	146.54	144	2.54	53.54
279		FAOK Anadarko	C1	152.71	144	8.71	303.75
279		FATX Highland Park-		178.07	176	2.07	179.74
279		FAOK Wilburton	C1	147.50	144	3.50	52.64
280	МО						
281	KWSM	FMTX Sherman	A	66.08	42	24.08	144.41



OVL ENGINEERING, INC. ENGINEERING EXHIBIT E-2